1	Douglas P. Cushing, WSB # 23392 JORDAN RAMIS PC		Hon. Mary Jo Heston Chapter 11		
2	Two Center	pointe Drive, Suite 600	Location: 500 W. 12th Street, 2d Floor, Vancouver, WA		
3	Lake Oswego, OR 97035 Telephone: (503) 598-7070 Fax: (503) 598-7373		Hearing Date: 1/9/18 Hearing Time: 9:00 a.m.		
4	Tax. (303).	Attorney for Creditor City of St	Helens	Response Date: 1/2/18	
5		Theomey for escaled only of St	. 11010115		
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7					
8	CHILD STITLES BITTING TO I COURT				
9 WESTERN DISTRICT OF WASHINGTON AT TACOMA				GTON	
10	_		Case No. 17-41	1216-MJH	
11	In re		DECLARAT	DECLARATION OF DOUGLAS P.	
12	PAUL JOE,		CUSHING IN SUPPORT OF		
13	Debtor.		CREDITOR CITY OF ST. HELENS' MOTION TO CONVERT THE		
14				CHAPTER 11 CASE TO	
15			TO 11 U.S.C	R 7 CASE PURSUANT C. § 1112(b)	
16					
17	I, DO	OUGLAS P. CUSHING, do hereby	state and declare	as follows:	
18	1.	I am the attorney of record for C	Creditor City of St	. Helens in the above-captioned	
19	bankruptcy.	I am over eighteen (18) years of ag	ge and competent	to testify to the facts contained	
20	herein. I ma	ake this declaration based upon my	personal knowled	lge and I am competent to	
21	testify.				
22	2.	I state that despite promises, the	City of St. Helen	s has received no evidence of an	
23	offer to purchase a portion of the property from Mr. Joe, nor of a proposal for financing.				
24	3.	I further state as of December 1	1, 2017, no propos	sed disclosure statement or plan	
25	has been filed in the present bankruptcy.				
	CREDITOR C DEBTOR'S C	ON OF DOUGLAS P. CUSHING IN SUI CITY OF ST. HELENS MOTION TO CO HAPTER 11 CASE TO A CHAPTER 7 I 12(b) - Page 1	NVERT THE	JORDAN RAMIS PC Attorneys at Law Two Centerpointe Drive, Suite 600 Lake Oswego, OR 97035 Telephone: 503.598.7070 Fax: 503.598.7373	

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11 U.S.C. § 1112(b) - Page 1

1	4. I further state that the City of St. Helens has discussed the status of any pending				
2	request for modification of the property lines with the Columbia County Planning Department,				
3	and that no such request has been submitted as of December 11, 2017.				
4	I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE				
5	AND CORRECT.				
6	Executed on December 12, 2017.				
7	JORDAN RAMIS PC				
8	Attorneys for Creditor City of St. Helens				
9	By: s/ Douglas P. Cushing				
10	Douglas P. Cushing, WSBA # 23392				
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DECLARATION OF DOUGLAS P. CUSHING IN SUPPORT OF CREDITOR CITY OF ST. HELENS MOTION TO CONVERT THE DEBTOR'S CHAPTER 11 CASE TO A CHAPTER 7 PURSUANT TO 11 U.S.C. \S 1112(b) - Page 2

JORDAN RAMIS PC Attorneys at Law Two Centerpointe Drive, Suite 600 Lake Oswego, OR 97035 Telephone: 503.598.7070 Fax: 503.598.7373 49698-71067 2877931_1\CS/12/12/2017

1	DECLARATION OF SERVICE
2	I hereby certify that on the date shown below, I served a true and correct copy of the foregoing DECLARATION OF DOUGLAS P. CUSHING IN SUPPORT OF CREDITOR CITY OF ST. HELENS MOTION TO CONVERT THE DEBTOR'S CHAPTER 11 CASE TO A
3	CHAPTER 7 PURSUANT TO 11 U.S.C. § 1112(b) on:
4	All ECF Participants
5	Nicholas J. Henderson, nhenderson@portlaw.com
6	Troy G. Sexton, tsexton@portlaw.com Attorneys for Debtor
7	Kathryn E. Perkins, kathryn.e.perkins@usdoj.gov
8	Attorney for US Trustee
9	United States Trustee, USTPRegion18.SE.ECF@usdoj.gov
10	x by electronic transmission.
11	
12	DATED: December 12, 2017.
13	s/ Douglas P. Cushing
14	Douglas P. Cushing, WSBA # 23392
15	Attorney for Creditor City of St. Helens
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DECLARATION OF SERVICE

JORDAN RAMIS PC Attorneys at Law Two Centerpointe Drive, Suite 600 Lake Oswego, OR 97035